

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

CARLOS JULIO, and DANIEL HERNANDEZ,  
individually and on behalf of all other persons  
similarly situated,

Plaintiffs,

- against -

KBR, INC., KBR HOLDINGS, LLC, BOLTON  
HOLDINGS, LLC d/b/a/ INDUSTRIAL TENT  
SYSTEMS LLC and d/b/a LODGING SOLUTIONS  
LLC, INDUSTRIAL TENT SYSTEMS, LLC,  
INDUSTRIAL TENT SYSTEMS HOLDINGS,  
LLC, LODGING SOLUTIONS, LLC, 2 M  
LODGING SOLUTIONS, LLC, and STAR  
PAYMENT SYSTEMS, INC.,

Defendants.

Case No.: 3:22-cv-530-HEH

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

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Named Plaintiff Daniel Hernandez, individually and on behalf of all opt-in plaintiffs and all others similarly situated (“Plaintiffs” or “Plaintiffs and the Putative Collective Members”), file their Motion for Leave to File a Second Amended Complaint pursuant to Fed. R. Civ. Pro. 15. For the reasons set forth in Plaintiffs’ Memorandum of Law in Support of this Motion (“Memorandum”), Plaintiffs respectfully request that the Court enter an Order granting Plaintiffs leave to file a Second Amended Complaint.

Date: November 15, 2022

Respectfully submitted,

By: /s/ Zev H. Antell  
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*Counsel for Plaintiffs*

#### **CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2022, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Zev Antell  
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